

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET and SARA
TAYLOR, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

Civil Action No. 1:25-cv-11121-PBS

**CONSENT MOTION FOR EXTENSION OF TIME
TO ANSWER PLAINTIFFS' FIRST AMENDED CLASS ACTION COMPLAINT**

Defendant, Liberty Mutual Insurance Company ("Liberty Mutual"), hereby files this Consent Motion for Extension of Time to Answer Plaintiffs' First Amended Class Action Complaint. In support of its requests, Liberty Mutual states the following:

1. Plaintiffs filed their First Amended Class Action Complaint ("Amended Complaint") on November 20, 2025. ECF No. 34.
2. Under Federal Rule of Civil Procedure 15(a)(3), Liberty Mutual's deadline to file its Answer to Plaintiffs' First Amended Class Action Complaint ("Answer") is December 4, 2025.
3. Pursuant to Local Rule 7.1(a)(2), undersigned counsel met and conferred with Plaintiffs' counsel on November 24, 2025 and obtained Plaintiffs' consent to Liberty Mutual's request to extend its deadline to file its Answer by seven days, until December 10, 2025.
4. The requested extension is the first request to extend time to file Liberty Mutual's Answer and will not impact other case deadlines.

5. The extension will allow Liberty Mutual to conduct a more thorough investigation of the allegations set forth in Plaintiffs' Amended Complaint, particularly in light of the Thanksgiving holiday.

WHEREFORE, Liberty Mutual respectfully requests that the Court grant its Motion for Extension of Time to Answer Plaintiffs' First Amended Class Action Complaint and extend Liberty Mutual's Answer deadline to December 10, 2025.

Respectfully Submitted,

Liberty Mutual Insurance Company,

By its attorney,

/s/ Kevin P. Polansky

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Dated: November 25, 2025

CERTIFICATE OF SERVICE

I, Kevin P. Polansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: November 25, 2025

/s/ Kevin P. Polansky

Kevin P. Polansky